

Facility Name

Category

EPA ID Number

Date of doc.

Confidential (Non CBI)

☐ yes →

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Project Manager Signature

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: JUN 6 2000

SUBJECT: Inspection of Marino Polishing & Plating, Inc. (EPA I.D. NYN008008005)

FROM: Jim Sullivan, Environmental Engineer
RCRA Compliance Branch



TO: Joel Golumbek, Chief
RCRA Compliance Branch

On April 11, 2000, I conducted an inspection of the Marino Polishing & Plating, Inc. facility located at 244-254 59th Street in Brooklyn, New York. Representing Marino Polishing & Plating, Inc was Gerald Marino, the company's President.

Marino is a contract bright nickel and chrome plater. The bulk of the items plated by Marino are brass and steel plumbing supplies. The current configuration of the automatic plating line is as follows: soap wash - cold water rinse - electrocleaner - cold water rinse - activator - 2 cold water rinses - electrocleaner - 2 cold water rinses - sulfuric acid dip - cold water rinse - nickel plating tank - 3 cold water rinses - chromic acid tank - 4 cold water rinses - the parts are placed on racks and placed in a drying oven.

The company treats wastewater associated with the plating operation prior to releasing it to the POTW via a permitted discharge. The treatment consists of cyanide destruction by the addition of sodium hypochlorite and chrome reduction by the addition of sodium metabisulfite. The only solid waste is a filter which is used to capture nickel. This filter is changed once every four months and carted off-site with general plant trash.

Marino Polishing & Plating, Inc. is currently not a generator of hazardous waste.

INSPECTOR'S MULTI-MEDIA SCREENING CHECKLIST

Revised: June 1999

Facility Name: Marino Polishing & Plating
Address: 244-254 59th St
Brooklyn, NY 11220
ID No.: NYN008008005
Contact: ^{Gerald}Jerry Marino Phone: 718-492-9822
Inspector: Jim Sullivan Phone: X4138 Div./Br.: R&B
Date of Inspection: 4/11/00 Referred by LAN to : _____
Date of Referral: _____ [LAN copy to C. Zafonte, MM Coordinator, for tracking.]

Referee is requested to provide an initial response within 3 weeks of the referral.

GENERAL GUIDANCE

VISUAL CUES OF POSSIBLE NON-COMPLIANCE WARRANTING INQUIRY

- Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.
- Stains or discoloration of soil, concrete, or floors in work areas.
- Distressed vegetation - unhealthy, discolored, or dead.
- Dark smoke or dust clouds, or smoke coming from other than a smoke stack.
- Unusual odors or strong chemical smells.
- Sheen on surface waters.

CHECK IT OUT!

- o ... if you see or hear something suspicious during an inspection. Ask probing questions:
 - What is it? Is it a waste product?
 - What process produced it?
 - Has it been tested?
 - Where do you normally dispose of it?
 - Do you have a permit for the disposal?
 - How long has the circumstance existed?
 - When did it begin?
- o Pay attention to the situation, and take photographs.
 - Note the location and the amount of pollutant that appears to be involved.
 - Take notes describing the situation, the source of the pollutant and its emission point.

REPORTING POSSIBLE NON-COMPLIANCE

Throughout this checklist, there are YES/NO questions to be circled. If you circle a field marked with an asterisk (*), you should promptly refer the matter to the Region II office for that program. After you return from your inspection, immediately let your supervisor know that you observed possible non-compliance in another program area during your inspection. The information should then be referred to the appropriate contact listed on page 2.

N.B.: YES or NO options that are in **BOLD** lead to follow-up questions.

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-Asbestos (AHERA & NESHAP):	Robert Fitzpatrick -4042	
CEPD/ESB:	Carlos O'Neill 787-729-6951(x230)	-
EMB:	Victor Trinidad x226	-
EPCRA Toxic Release Inventory:	Dan Kraft 732-321-6669	4
- All other EPCRA:	Nora Lopez 732-906-6890	4
	John Higgins -6194	
Federal Facilities:	John Gorman 212-637-4008	-
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FIFRA:	Adrian Enache 732-321-6769	5
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	NY & Caribbean: John Lapadula -4262	
Removal Actions:	Richard Salkie 732-321-6658	-
	Bruce Sprague -6656	
SPCC/FRP:	Doug Kodama 732-906-6905	9
TSCA:	Dan Kraft 732-321-6669	10
PCBs	Dave Greenlaw 732-906-6817	
Chemicals	Mike Bious 732-906-6892	
UST:	John Kushwara 212-637-4232	11
Wetlands:	Daniel Montella 3801	11
<u>Criminal Investigations Division -</u>	William V. Lometti 3634	11

Air

- With the sun in a 140° arc BEHIND you, is opaque smoke is being emitted?

YES* NO

Note: "Opaque smoke" is not steam -- will obscure anything behind it for >5 minutes.
Steam dissipates at a given point; smoke trails off.

Note relative positions of the sun, the observer and the emission point.

If YES:

- Note color of smoke: _____.
- From which specific process line is smoke coming? (e.g., "Boiler No. 4" or "Coating Line C"). _____.
- What is the cause of the smoke emission? e.g., –
 - i. Is air pollution control equipment out of service, or turned off during production?
If YES: When will it be back on line? _____

YES NO

- ii. Is the facility under an unusual load, using different fuels, or process feeds?

YES NO

- Have any processes been added or changed in any way in the last 2 years?

YES NO

If YES: Did the facility obtain state or federal air pollution permits for it?

YES NO*

- Has the facility undergone any renovation or demolition during the last 18 months, involving removal or disturbance of asbestos-containing materials?

YES NO

Approximate square or linear feet of materials involved? _____.

If >260 linear feet, or 160 square feet, **REFER** to Air Compliance Branch;
and Ask: was EPA notified of removal?

YES NO*

- Do facility employees maintain, service, repair, or dispose of air conditioning/refrigeration equipment involving CFC refrigerant?

YES NO

If YES: Does facility have Recovery/Recycle or Recovery only equipment?

YES NO*

Emergency Planning and Community Right-to-know Act (EPCRA)

EPCRA Hotline Information: 800-535-0202

Toxic Release Inventory (TRI)

For manufacturing facilities, ask 1-2:

1. Does the facility have 10 or more full-time employees? *11*
- If "NO", skip to All Other EPCRA.
2. Is the facility classified under SIC codes 20-39?

YES NO

YES NO

If the answers to **both** Questions 1. and 2. are **YES**, ask :

- 3a. Did the facility use >10,000 lb. of a chemical during any of the past 5 calendar years?

If a. is **YES**, ask:

- b. Did the facility file a §313 Toxic Chemical Release Inventory Form R for the chemical?

YES NO

YES NO*

If the answer to Q1 is **YES**, but the answer to Q2 is **NO**, continue with Q4.

4. Is the facility classified under any of the following sectors (SIC codes outside 20-39)?

YES	NO	Type of facility	YES	NO	Type of facility
<input type="checkbox"/>	<input checked="" type="checkbox"/>	commercial hazardous waste treatment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	petroleum bulk terminals
<input type="checkbox"/>	<input checked="" type="checkbox"/>	metal mining,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	chemical wholesale
<input type="checkbox"/>	<input checked="" type="checkbox"/>	coal mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	solvent recovery services.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	electric utilities			

5. Did the facility use >10,000 lb. of a chemical during 1998 or later calendar years?

YES NO

N.B.: "Use" includes treatment, stabilization or disposal of a waste received from off-site for waste processing.

If Q5 is answered **YES** before July 1999, refer to compliance assistance at 732-321-6759.

---- after July 1999, ask:

- Did the facility file a §313 Toxic Chemical Release Inventory Form R for the chemical?

YES NO

All Other EPCRA:

- Is there on-site any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities (which vary by chemical, and range from 1 to 5000 lb.)?
If **YES**: Were the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) notified of these chemicals for local planning purposes?

YES NO

YES NO*

- Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity (assume 1 lb.)?
If **YES**: Was notification of the release provided?

YES* NO

YES NO*

- If **YES**: i. To whom was the notification given? _____
- ii. Was notification oral or written? _____
- iii. If oral, was a written, follow-up report submitted? _____

YES NO*

[If the facility does not know the answers to any of i, ii, or iii questions, *REFER*.]

- Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard?

YES NO*

- If the facility has >10,000 lb of any hazardous chemicals, or Extremely Hazardous Substances >threshold planning quantities, have MSDS (or a list of MSDS), and chemical inventory forms been given to state and local emergency planning authorities and the local fire department?

N/A
YES NO*

Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

N.B.: If you answer NO to the 1st question in any of the following 4 sections, skip that section & go to the next section.

1. If inspecting a manufacturing facility, ask:

A. Are any pesticides manufactured, relabeled, or repackaged at this establishment?
Pesticide is any substance or mixture intended (1) to prevent, destroy, repel, or mitigate any pest, or (2) for use as a plant regulator, defoliant, or desiccant.

YES NO

B. If A. is YES, does the establishment have an EPA Establishment Number?

YES NO*

All production, relabeling and/or repackaging must be registered with EPA.)

C. If B. is Yes, enter the Establishment Number: _____ and continue:

D. Has the company filed the Annual Pesticide Production Report form?

YES NO*

(due March 2 of each year for the previous calendar year's production.)

2. If inspecting a storage-distribution facility or a retail facility, ask:

A. Are any pesticides being held for sale/distribution, or stored at this facility (warehouse)?

YES NO

B. If A. is YES, are restricted-use pesticides stored, or held for distribution/sale at this facility?

YES* NO

C. Are any containers leaking?

YES* NO

D. Are pesticides stored next to acid, caustic and/or oxidizing materials?

YES* NO

3. If pesticides may not have been properly used, observe and record any effects such as human adverse reaction(s), dead fish, birds, or wildlife, plant damage, etc, and ask:

A. Have pesticides been applied by an employee or by a pesticide application company?

YES* NO

B. If A. is YES, ask for:

- Date of application,
- Name of pesticide applied,
- Name of pesticide applicator company, or facility person who made the application,
- Address and/or phone number of pesticide applicator company (if applicable),
- Type of health complaints from employee (if applicable),
- Contact person for follow-up.

4. If inspecting a public housing, educational, or day care facility, farm market, flea market, spa or health facility, beauty parlor, or private housing, are pesticides sold there?

YES* NO

A. If 4. is YES, are the pesticides registered for agricultural use (see label)

YES* NO

If you suspect, or are unsure if the pesticides are registered for agricultural use, *Refer*.

B. If A. is YES, ask for:

- Name and identity (e.g farmers, homeowners, pesticide applicators, etc.) of the buyers,
- Address and telephone number of the buyers,
- Name(s) of pesticide purchased,
- EPA Registration Number (EPA Reg. No.) of pesticide(s) purchased.

C. Are pesticides sold in unlabeled containers or with hand-written labels.

YES* NO

Note: If you suspect, but are unsure, that pesticides are being sold in unlabeled containers, or with hand-

written labels, *REFER* this.

NPDES, Pretreatment & UIC

1. Does the facility generate industrial wastes/wastewater (IW), sanitary wastewater (WW) and/or storm water (SW) and dispose of any of it as follows (**Circle as applicable**):

- | | | | |
|--|-----------|-----------|----|
| a. To a receiving stream/surface water body (or onto ground near enough to impact one)?..... | IW | WW | SW |
| b. To a sanitary sewer system that discharges to a municipal treatment plant (POTW)?..... | <u>IW</u> | <u>WW</u> | SW |
| c. To a storm water sewer system?..... | IW* | WW* | SW |
| d. To a subsurface disposal system (septic system, drywell, cesspool, sinkhole)?..... | IW* | WW | SW |
| e. Is any of it trucked off site?..... | IW | WW | SW |
| f. Onto ground surface (e.g. spray, discharge pipe, open trench) | IW | WW | SW |

Identify the water bodies and/or sewer system: NYC POTW

2a. Are there floor drains, sinks (not in bathrooms), or storm water collection structures:

- where raw materials, products, wastes or wastewaters are generated, stored or transported &/or
- that are possibly receiving wastes due to poor housekeeping, etc.?

YES NO

b. If yes to a, is there fluid in the drain/structure?

YES NO

c. If yes to a, is there evidence that contaminants entered drain/structure?
(e.g., discolored or smelly fluid; stained drain or floor nearby)

YES* NO

d. Ask what types of fluids enter drains/structures: _____

e. Ask where each drain discharges to and indicate in question 1.

3a. Has the facility applied for a permit for each discharge noted in questions 1 and 2?
If permitted, ask for permit numbers _____

YES NO*

b. If you answered yes to question 1a or 1c for storm water, but the facility does not have a storm water discharge permit, ask why (facility may not be subject to stormwater requirements):
N/A

c. If you answered question 3b, ask what SIC code(s) describe all the facility's activities¹:

4 a. Does the facility treat wastewater before discharge?

YES NO

b. How is it treated? CN Destruction, Chl. Reduction

¹ If the first 2 digits of any facility SIC code are 10-14, 20-45 or 51, or if facility is a landfill/land application site, recycler, hazardous waste TSD, or steam electric power generator, or if there are construction activities covering >5 acres, refer this to the water program (WCB, if the site is in NY or NJ; CEPD's ESB, if in PR or VI).

* Refer this to water program (to WCB, if the site is in NY or NJ; to CEPD's ESB, if in PR or VI).

Public Water Supply

1. Observe/Ask: Does the facility have its own potable water supply? YES ☒ NO
2. If YES, does the facility provide potable water for 25 or more persons? YES NO
3. If YES, is the water analyzed for contaminants & results reported to the state? YES NO*

* Refer this to water program (to WCB, if the site is in NY or NJ;
to CEPD's EMB, if in PR or VI).

Radiation

1. Are radioactive materials used or stored at this facility? YES ☒ NO
2. If YES, does the facility have a state or federal radiation license for them? YES NO*

Resource Conservation & Recovery Act (RCRA)

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), **DO NOT** answer the rest of the RCRA questions, but enter the facility's EPA ID #: _____.

If the facility does not have this ID number, ask:

- 1.A. Has the facility determined that it generates hazardous waste? YES NO
 If YES, ask how the determination was made: _____
 If NO, skip Questions 2 to 8 and go to Question 9. If YES, continue:
 - B. If the facility generates or transports hazardous waste, ask for its EPA ID No.? _____
 If the facility cannot produce an ID Number, ***REFER***.]
- 2.A. Are there containers or tanks that hold hazardous waste? YES NO
 If NO, go to Question # 3. If YES, continue:
 - B. Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date? YES NO*
 - C. Do hazardous waste storage tanks have secondary containment (berm, vault, double walls)? YES NO*
 - D. Does the facility store hazardous waste in containers or tanks for >90 days? YES* NO
3. Does the facility store, treat or dispose of hazardous waste in lagoons, pits, piles or landfills? YES* NO
4. Does the facility treat hazardous waste by incineration, precipitation, neutralization, or other means to change the physical or chemical nature of the waste? YES* NO
5. Does the facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)? YES* NO
6. Does the facility maintain copies of hazardous waste manifests on-site? YES NO*
7. Do hazardous waste storage or treatment units (e.g., containers or tanks) appear to be poorly maintained and may release hazardous waste to the environment? YES* NO
8. Do chemicals or wastes appear to have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges? YES* NO
- 9.A. Does the facility generate non-hazardous process wastes, excl. office paper, cafeteria wastes, etc? YES NO
 If NO, go to Question # 10. If YES, continue:
 - B. Does the facility handle process wastes, such as treatment sludges, ash, solvents, waste oils, spent catalysts, acids or bases? YES* NO
 If yes, please briefly describe the process(es) that generate these wastes .

10. Does material handling at the facility appear to pose, or actually pose, a significant threat to human health or the environment? YES* NO

Spill Prevention, Control & Countermeasure (SPCC)

1. A. Does the facility store oil, whether petroleum, vegetable or transformer oil?
 B. If YES, does the storage capacity exceed: 660 gallons in any one above-ground tank?
 1320 gallons in all above-ground tanks?
 42,000 gallons in underground tank(s)?
2. If the answer to any part of #1. B. was YES, did the facility show you a copy, or have available a Spill Prevention, Control, and Countermeasure (SPCC) Plan?
3. Did the facility have an oil spill within the last 12 months?

YES NO

YES* NO

YES* NO

YES* NO

YES NO*

YES* NO

Facility Response Plan (FRP)

1. Does the facility have an above-ground oil storage capacity $\geq 42,000$ gallons and conduct operations that include over-water transfers of oil to or from vessels?
2. Does the facility have oil storage capacity \geq one million gallons?
3. Did the facility submit a Facility Response Plan to the EPA?

YES* NO

YES* NO

YES NO

N/A

Toxic Substances Control Act (TSCA)

Polychlorinated Biphenyls (PCBs)

SAFETY WARNING: Stay ten feet from any high voltage conductors.

- Transformer outside belongs to Con Edison*
1. Is there liquid-filled electrical equipment (transformers, capacitors) manufactured before 1980? YES NO
(Exclude equipment with <3 lb (1 quart) of fluid, but include only utility-owned equipment, if inspecting a utility.) N/A
- A. If Yes, how many of the above are transformers containing: PCBs >500 ppm? _____ *
- <500 ppm but ≥ 50 ppm? _____ *
- fluid of unknown PCB concentration? _____ *
- B. If Yes, how many of the above are capacitors? _____ *
2. Are there hydraulic systems manufactured before 1980 that use/used high temperature fluid? YES NO (NO)
- A. If Yes, has each system been tested for PCBs? YES NO* (NO)
- B. Do any currently have PCB concentrations ≥ 50 ppm? YES* NO (NO)
3. Does the facility have any oil-filled heat transfer systems manufactured before 1980? YES NO (NO)
- A. If Yes, has each system been tested for PCBs? YES NO* (NO)
- B. Do any currently have PCB concentrations >50 ppm? YES* NO (NO)
4. Does the facility have PCB waste stored for disposal? YES* NO (NO)
- OBSERVE PCB Items** (transformers, capacitors, containers)
- Are any leaking? YES* NO (NO)
 - Do all (except transformers <500 ppm) have a PCB Mark M_L? YES NO* (NO)
- OBSERVE PCB Waste:** In addition to the PCB Mark M_L, is PCB waste in storage for disposal marked with the **date removed from service**? YES NO* (NO)
- Is **PCB waste currently stored** for more than 30 days in any area? YES NO (NO)
- If Yes, does the area have a roof and walls to keep out rain? YES NO* (NO)
- a 6"-high impervious containment berm? YES NO* (NO)
- a PCB Mark M_L for the area? YES NO* (NO)
- a location not in a 100-year flood plain? YES NO* (NO)

General Chemical Regulations: Does the facility manufacture, or import into the United States, any chemicals for which they are the sole manufacturer/importer?

YES NO

If YES, do they know that these chemicals are on the TSCA chemical inventory?

YES NO*

Underground Storage Tanks (USTs)

Does any UST have >10% volume underground and contain petroleum products or CERCLA hazardous substances?

*3-550 gallon USTs
heating oil*

YES NO

Do all USTs store fuel oil for on-site heating?

YES NO

If YES, the facility is exempt. Do not complete the rest of the UST questions.

Name the petroleum product or hazardous substance in each UST. _____

Is there evidence of UST leakage/spillage?

YES* NO

*** Refer facility to the Water Compliance Branch.**

Wetlands

1. A. Are wet areas (marshes, swamps, bogs) on or adjacent to the site?
(A federal wetland need not have standing water or wetland-type vegetation; some wetlands have shrubs and trees.)

YES NO

B. Are there any waterbodies or waterways on or adjacent to the site?

YES NO

2. If # 1. A **OR** B is YES, is any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the areas, **or** is there any evidence that such activities occurred very recently?

YES NO

3. If YES, when was the work undertaken? _____
Does the facility have any permits for this work?

YES
S
NO
*

4. If YES, what agency(s) issued the permits? _____
e.g., U.S. Army Corps of Engineers; State environmental agency.
For federal permits, what type of permits are they (i.e., nationwide, regional, individual)?

If facility is unable to provide adequate response to # 4, ***REFER***.

CRIMINAL ACTS

During the course of this inspection, has anything been brought to your attention indicating:

1. That the facility is involved in deliberate acts of dumping or discharging wastes

YES* NO

2. Bad intent or conduct? e.g., falsification of records or efforts to conceal activities?

YES* NO

3. Actual harm to individuals as a result of violations?

YES* NO

4. Other activity or behavior that you believe indicates criminal behavior?

YES
S*
NO

*** Refer to Criminal Investigation Division, if you checked YES.**